

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JACKSON LEWIS LLP
ATTORNEYS FOR DEFENDANT MSLGroup
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ATTORNEYS OF RECORD:

VICTORIA WOODIN CHAVEY, ESQ.
JEFFREY W. BRECHER, ESQ.

-----X

MONIQUE DA SILVA MOORE,
MARYELLEN O'DONOHUE, LAURIE
MAYERS, HEATHER PIERCE, and
KATHERINE WILKINSON, on behalf of
themselves and all others similarly situated,

Plaintiffs,

Case No. 11-cv-1279 (ALC) (AJP)

vs.

PUBLICIS GROUPE SA and
MSLGROUP,

Defendants.

-----X

**AFFIRMATION OF JEFFREY W. BRECHER IN OPPOSITION TO
PLAINTIFFS' MOTION FOR LEAVE TO FILE A SECOND AMENDED COMPLAINT**

I, Jeffrey W. Brecher, Esq., an attorney admitted to practice law before the Courts of the State of New York and, inter alia, before the United States District Court for the Southern District of New York, hereby affirm, under penalty of perjury, as follows:

1. I am a member of the law firm Jackson Lewis LLP, counsel for Defendant MSLGroup.

2. The following statements are true based upon my own knowledge, review of pertinent documents, and information and belief.

3. Attached as Exhibit 1 is a true and correct copy of the May 5, 2011 Proposed Case Management Plan.

4. Attached as Exhibit 2 is a true and correct copy of portions of the July 21, 2011 hearing transcript.

5. Attached as Exhibit 3 is a true and correct copy of the July 2011 Revised Proposed Scheduling Order.

6. Attached as Exhibit 4 is a true and correct copy of the February 24, 2012 Opinion and Order by the Honorable Andrew J. Peck.

7. Attached as Exhibit 5 is a true and correct copy of relevant portions of Carol Perlman's deposition transcript.

8. Attached as Exhibit 6 is a true and correct copy of relevant portions of Katherine Wilkinson's deposition transcript.

9. Attached as Exhibit 7 is a true and correct copy of relevant portions of Zaneta Hubbard's deposition transcript.

10. Attached as Exhibit 8 is a true and correct copy of Plaintiff da Silva Moore's E.E.O.C. Charge of Discrimination filed on January 26, 2010.

11. Attached as Exhibit 9 is a true and correct copy of the determination letter issued by the E.E.O.C. on November 29, 2010.

Affirmed on this 19th day
of March 2012.

s/

JEFFREY W. BRECHER, ESQ.

CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2012, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Southern District's Local Rules, and/or the Southern District's Rules on Electronic Service upon the following parties and participants:

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s/
JEFFREY W. BRECHER